

# **EXHIBIT 2**

# **FILED UNDER SEAL**

**From:** Whitney.Weber@lw.com  
**Sent:** Saturday, September 23, 2017 12:01 PM  
**To:** James Judah; Melanie.Blunsch@lw.com; UberWaymoMoFoAttorneys@mofo.com; BSF\_EXTERNAL\_UberWaymoLit@BSFLLP.com; DG-GPOttoTruckingWaymo@goodwinlaw.com; Uber-sg@LISTS.SUSMANGODFREY.COM; miles@ramsey-ehrllich.com; izzy@ramsey-ehrllich.com; amy@ramsey-ehrllich.com; jbartlett@mkwllp.com; af@annefokstuen.com; jpatchen@taylorpatchen.com; John.Eastly@LW.com; mpernick@mkwllp.com; wfarmer@fbj-law.com  
**Cc:** QE-Waymo; JCooper@fbm.com; MCate@fbm.com  
**Subject:** RE: Waymo v Uber - Stroz Privacy Search Terms

James,

Please see below for a chart detailing the document hit-count for each term, by custodian. Certain documents contain hits for multiple terms. Thus, at the end of the chart detailing the hits for each search term, we have included a row showing the total number of documents that are implicated for each custodian (i.e., a de-duped number). Altogether, the terms hit on 1,134 documents that have been withheld on privacy grounds.

	Levandowski	Sebern	Ron	Juelsgaard	Total Hits for Search Term
<b>Lidar</b>	47	0	10	22	79
<b>Laser</b>	97	52	11	108	268
<b>Diode</b>	3	0	0	54	57
<b>Fiber</b>	15	139	9	49	212
<b>FAC</b>	5	12	0	96	113
<b>PCB</b>	20	21	10	63	114
<b>SNV</b>	3	2	17	58	80
<b>GBR</b>	0	1	1	9	11
<b>GBR3</b>	0	0	0	0	0
<b>GBR2</b>	0	0	0	0	0
<b>PBR</b>	0	5	3	35	43
<b>CBR</b>	6	2	0	12	20
<b>UBR</b>	0	0	0	0	0
<b>YBR</b>	0	0	1	1	2
<b>Otto</b>	12	25	9	15	61
<b>Ottomotto</b>	21	0	63	0	84
<b>Uber</b>	19	32	58	20	129
<b>280 Systems</b>	2	0	21	0	23
<b>Chauffeur</b>	17	2	2	7	28
<b>Tyto</b>	8	0	0	5	13
<b>Odin Wave</b>	12	0	0	5	17
<b>Bismuth</b>	27	0	0	7	34

<b>Sandstone</b>	31	2	1	8	42
<b>Total Hits by Custodian</b>	345	295	216	574	
<b>Total Documents Affected by Custodian</b>	270	281	186	397	

**From:** James Judah [mailto:jamesjudah@quinnemanuel.com]

**Sent:** Friday, September 22, 2017 3:57 PM

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**Cc:** QE-Waymo <qewaymo@quinnemanuel.com>; 'John Cooper' <JCooper@fbm.com>; 'MCate@fbm.com' <MCate@fbm.com>

**Subject:** Waymo v Uber - Stroz Privacy Search Terms

Melanie –

Here is the first set of search terms we would like Stroz to run against the privacy screened files. Please let us know how soon you can provide hit counts, ideally broken out by custodian.

LiDAR  
Laser  
Diode  
Fiber  
FAC  
PCB  
SVN  
GBr  
GBr3  
GBR2  
PBr  
CBr  
UBr  
YBr  
Otto  
Ottomotto  
Uber  
280 Systems  
Chauffeur  
Tyto  
Odin Wave

Bismuth  
Sandstone

James

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